

Petitt Worrell Craine Wolfe LLC

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Melanie Damian
1000 Brickell Avenue
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33131 USA

November 3, 2014

File #: 0430
Inv #: 5663

Attention:

RE: Securities & Exchange Commission v. Price, et al.

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-01-14	[CASE ADMINISTRATION] File Complaint and Summons for Damian v. Scan International U.S.A, Inc.	0.40	30.00	KR
Aug-05-14	[ASSET DISPOSITION] Review of termination provisions in contract; prepare and forward Notice of Termination to absentee purchaser for Long Boat Key bank site; forward same and update to client.	1.00	265.00	RMB
Aug-06-14	[CASE ADMINISTRATION] Review instructions to parties and counsel (.4); Review filed Complaint and Summons (.5).	0.90	238.50	AEW
Aug-07-14	[CASE ADMINISTRATION] Review email from co-counsel regarding another Complaint to be filed (.1); Review Motion for Extension of Time for Damian to Respond to Complaint (.4); Review Order granting Consent Motion for Extension of Time for Damian to Respond to Complaint (.1).	0.60	159.00	AEW
Aug-08-14	[CASE ADMINISTRATION] Review Complaint and Summons	1.10	291.50	AEW

EXHIBIT "D"

Aug-09-14	[CASE ADMINISTRATION] Review Notice of Change of Address for counsel of St. Paul (.1); Review emails regarding Pro Hac Vice Application (.1).	0.20	53.00	AEW
Aug-12-14	[CASE ADMINISTRATION] Review email from co-counsel regarding subpoenas to be served and review subpoenas (.2); Review Order regarding Granting Extensioin of Time to Respond to Complaint (.1); Review Certificate of Service (.1).	0.40	106.00	AEW
Aug-19-14	[CASE ADMINISTRATION] Review Thigpen Complaint	1.00	265.00	AEW
Aug-20-14	[CASE ADMINISTRATION] Review Order granting Motions to Add Foreign Counsel (.1); Review Joint Statement of Stipulated Facts from Household Life Insurance Company and Protective Life Insurance Company (.5); Review Proposed Order (.1); Review Motion to Add Foreign Counsel (.3).	1.00	265.00	AEW
Aug-21-14	[CASE ADMINISTRATION] Review Genworth's responses and objections to Receiver's First Request to Produce, Interrogatories and Requests for Admission (1.4); Review priviledge log (.4); Review Certificates of Service for Genworth and Household Life Insurance (.2).	2.00	530.00	AEW
Aug-29-14	[CASE ADMINISTRATION] Review Complaint against Nelson Mullins and various other individuals along with attachments (1.4); Email to Guy Giberson regarding potential conflict (.1); Confer with Guy Giberson regarding issues with Complaint and potential conflict (.4); Various emails from and to Guy Giberson regarding Complaint (.4); Confer with Mark Robinson regarding new Complaint (.3).	2.60	689.00	AEW
	[CASE ADMINISTRATION] Review of complaint, revisions to complaint, filing, and phone call with counsel.	2.30	609.50	MSR
	[CASE ADMINISTRATION] Confer with co-counsel regarding receipt of Tolling Agreement and retraction of Complaint.	0.20	53.00	MSR

	[CASE ADMINISTRATION] Filing of Summons and Complaint on Nelson Mullins along with Exhibits and Affidavit	0.80	60.00	KR
Sep-02-14	[CASE ADMINISTRATION] Review Pro Hac Vice Applications for Kenneth Dante Murena and Amanda Lara Fernandez for the Lwis and Scan International cases	0.40	106.00	AEW
	[CASE ADMINISTRATION] Filing of Pro Hac Vice for Amanda Lara Fernandez on Scan International	0.20	15.00	KR
	[CASE ADMINISTRATION] Filing of Pro Hac Vice for Melissa Damian Visconti on Osama Lwis	0.20	15.00	KR
	[CASE ADMINISTRATION] Filing of Pro Hac Vice for Kenneth Dante Murena on Scan International	0.20	15.00	KR
	[CASE ADMINISTRATION] Filing of Pro Hac Vice for Kenneth Dante Murena on Osama Lwis	0.20	15.00	KR
Sep-03-14	[CASE ADMINISTRATION] Review of Rhonda Norris and TJS Deeman Dana, LLP's Objections to the Receiver's subpoenas to produce documents without deposition	0.40	106.00	AEW
Sep-05-14	[CASE ADMINISTRATION] Review note from the court admitting Kenneth Dante Murena (.1); Review note from the court admitting Amanda Lara Fernandez (.1); Review note from the court admitting Timothy Batten Sur (.1).	0.30	79.50	AEW
Sep-12-14	[CASE ADMINISTRATION] Review Complaint Answer and Exhibit to Answer for St. Paul v. Montgomery et. al.(1.7); Email to co-counsel regarding Answer filed (.1).	1.80	477.00	AEW
	[CASE ADMINISTRATION] File Answer, Affirmative Defenses, and Counterclaim on St. Paul Mercury Insurance Co. v. Damian	0.40	30.00	KR
Sep-22-14	[CASE ADMINISTRATION] Review St. Paul Mercury Insurance Company's initial disclosures and attachments (.7); Review Joint Preliminary Report and Discovery Plan filed by St. Paul Mercury (.8); Review Propsed Scheduling Order (.2); Review Memorandum	2.70	715.50	AEW

	in Support of Motion of FDIC-R as receiver for Montgomery Bank and Trust for immediate stay of proceedings (.8); Review Proposed Order (.1); Review signed Scheduling Order (.1).			
Sep-23-14	[CASE ADMINISTRATION] Review several emails related to extension requested by FDIC-R as receiver to complete its reply Brief on the Motion to Dismiss (.2); Review St. Paul's response to the FDIC-R's Motion to Dismiss and review numerous exhibits (2.0)	2.20	583.00	AEW
Sep-24-14	[CASE ADMINISTRATION] Review Joint Motion for Extension of Time from FDIC-R and St. Paul to respond to FDIC-R's Motion to Stay and FDIC-R's Reply to St. Paul's Response to FDIC'receiver's Motion to Dismiss (.2); Review Proposed Order (.1); Review Receiver's First Request for Production, Request for Admission and Interrogatories (.9); Review Motion to Compel Discovery and Memorandum of Law (1.0)	2.20	583.00	AEW
Sep-25-14	[CASE ADMINISTRATION] Review Waiver exhibits and correspondence related to the Motion to Compel (.4); Review privilege log (.3); Review Genworth's responses and Objections to Receiver's First Request for Production of Documents, Request for Admissions and Interrogatories (.8); Review email from the Judge's law clerk regarding Resolution of Discovery disputes (.1).	1.60	424.00	AEW
Sep-29-14	[CASE ADMINISTRATION] Review Order granting extension	0.10	26.50	AEW
Oct-02-14	[CASE ADMINISTRATION] Review Stipulated Protective Order	0.80	212.00	AEW
Oct-06-14	[CASE ADMINISTRATION] Review Stipulated Protective Order	0.90	238.50	AEW
Oct-07-14	[CASE ADMINISTRATION] Review memo in support of FDIC-R Motion to Dismiss PFGBI Receiver's Counterclaim for Lack of Subject Matter Jurisdiction	0.70	185.50	AEW
Oct-08-14	[CASE ADMINISTRATION] Review Genworth Life Insurance Company's amended	0.50	132.50	AEW

Response and Objections to Receiver's First Request for Admissions (.4); Review Summons issued to Edgar Stuardo in Guatemala (.1).

Oct-09-14	[CASE ADMINISTRATION] Review email from court regarding Notice of Video Deposition	0.20	53.00	AEW
Oct-10-14	[CASE ADMINISTRATION] Review reply in support of FDIC-R's Motion to Stay	1.00	265.00	AEW
Oct-15-14	[CASE ADMINISTRATION] Review Genworth Insurance Company's Objection to Receiver's Notice of Videotaped Deposition	0.90	238.50	AEW
Oct-17-14	[CASE ADMINISTRATION] Review Certificate of Service for Genworth Objections to Receiver's Notice of Videotaped Deposition (.1); Review electronic summons issued for various parties (.2); Review Receiver's Motion to Extend Discovery Period (.8); Review Exhibit A to Motion (.3); Review Exhibit B to Motion (.1)	1.50	397.50	AEW
	[CASE ADMINISTRATION] File Unopposed Motion for Enlargement of Time to File Response to FDIC-R's Motion to Dismiss and Motion for Enlargement of Time to File Motion to Strike Counter-Def Affirmative Def - St Paul along with corresponding Orders with the Northern District of Georgia	0.50	37.50	KR
Oct-18-14	[CASE ADMINISTRATION] Review Affidavit of Alan Curley and exhibits (1.0); Review Motion for Enlargement of Time to File Motion to Strike (.5); Review Order (.1); Review Unopposed Motion for Enlargement of Time to File Response to FDIC-R's Motion to Dismiss (.4); Review Order (.1)	2.10	556.50	AEW
Oct-20-14	[CASE ADMINISTRATION] Review Receiver's Initial Rule 26 Disclosure's and exhibits (1.4); Review Certificate of Service (.1); Review Certificate of Interested Persons and Corporate Disclosure Statement (.4); Review Order Granting Enlargement of Time to Strike Affirmative Defense (.1).	2.00	530.00	AEW
	[CASE ADMINISTRATION] File Certificate	0.30	22.50	KR

of Interested Persons with Northern District of Georgia

Oct-22-14	[CASE ADMINISTRATION] Review Pro Hac Vice Application for Kenneth Dante Murena in St. Paul Mercury v. Montgomery County (.2); Review and revise Pro Hac Vice Application for Jason Mazer in St. Paul Mercury v. Montgomery County (.2).	0.40	106.00	AEW
Oct-23-14	[CASE ADMINISTRATION] Prepare Application of Pro Hac Vice for Kenneth Dante Murena and Jason S. Mazer (1.0); File Applications of Pro Hac Vice with the Northern District Court of Georgia (.2).	1.20	90.00	KR
Oct-27-14	[CASE ADMINISTRATION] Review Order Enlarging Time to File Response to Motion to Dismiss	0.20	53.00	AEW
Oct-28-14	[CASE ADMINISTRATION] Review and revise the Complaint for Tim Cannady (1.5); Email to Jeanette to get clarification on spelling of Defendant's name (.1).	1.60	424.00	AEW
	[CASE ADMINISTRATION] File Complaint and Summons for new case against Timothy Cannady.	0.50	37.50	KR
Oct-30-14	[CASE ADMINISTRATION] Review and revise Complaint for Nelson Mullins.	1.50	397.50	MSR
	[CASE ADMINISTRATION] Revise Complaint for Nelson Mullins and File with the Northern District of GA.	0.70	185.50	KR
Oct-31-14	[CASE ADMINISTRATION] Review approval of Pro Hac Vice Minute Order for Kenneth D. Murena (.1); Review approval of Admission of Jason Mazer Pro Hac Vice (.1); Review Receiver's Ninth Status Report and all exhibits (2.0); Review Order granting Pro Hac Vice application for Jason Mazer (.1); Review Order approving Pro Hac Vice for Kenneth D. Murena (.1); Review Instructions to Parties (.5).	2.90	768.50	AEW
	[CASE ADMINISTRATION] Notice from court of filing of complaint - review of documents received.	0.30	79.50	MSR

Totals

48.10 \$11,815.50

DISBURSEMENTS

Aug-01-14	Photocopies - Black and White 25 @ 0.15	3.75
Sep-02-14	Photocopies - Black and White 41 @ 0.15	6.15
Sep-12-14	Photocopies - Black and White 57 @ 0.15	8.55
Oct-17-14	Photocopies - Black and White 16 @ 0.15	2.40
Oct-20-14	Photocopies - Black and White 8 @ 0.15	1.20
Oct-28-14	Photocopies - Black and White 18 @ 0.15	2.70
Oct-30-14	Photocopies - Black and White 22 @ 0.15	3.30

Totals

\$28.05

Total Fee & Disbursements**\$11,843.55**

Previous Balance

57,582.78

Balance Now Due**\$69,426.33**

TAX ID Number 27-3424894

ATTORNEY BREAKDOWN

Petitt Worrell Invoice (August 2014 - October 2014) #5663

		Asset Disposition (hours)	Asset Analysis And Recovery (hours)	Case Administration (hours)	
RMB	Michael Brooks Senior Of-Counsel	1.0	0	0	1.0
AEW	Andrew Worrell Senior Partner	0	0	37.2	37.2
MSR	Mark Robinson Senior Partner	0	0	4.3	4.3
KR	Kelly Rosser Paralegal (\$75 / hr)	0	0	5.6	5.6
		1.0	0	47.1	48.1
					Total Hours